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*Attorneys for Defendant Massachusetts Mutual Life Insurance Company*

**UNITED STATES DISTRICT COURT  
 DISTRICT OF NEVADA**

SANGHAMITRA BASU,  
 Plaintiff,

vs.

MASSACHUSETTS MUTUAL LIFE  
 INSURANCE COMPANY,  
 Defendant.

Case No.: 2:20-cv-01432-JCM-BNW

**JOINT MOTION FOR EXTENSION OF  
 TIME TO FILE JOINT PRETRIAL  
 ORDER**

**[SECOND REQUEST FOR  
 EXTENSION BY MOTION, SIXTH  
 EXTENSION REQUEST OVERALL]**

Pursuant to LR IA 6-1 and LR 26-1(b)(5), Defendant Massachusetts Mutual Life Insurance Company (“MassMutual”) and Plaintiff Sanghamitra Basu, by and through their counsel of record, hereby move this Court for an extension until March 16, 2023 to file its Proposed Joint Pretrial Order. The parties previously filed four stipulations and one motion to extend the time to complete discovery, which included extension of the pretrial order deadline. Docket Entry (“D.E.”) 22; D.E. 24, D.E. 30; D.E. 32; D.E. 44.

**(a) Status of Dispositive Motions and Pretrial Order**

By this Court’s order dated December 21, 2021, and pursuant to LR 26-1(b)(5), dispositive motions were due February 17, 2022 and the parties’ joint pretrial order was due March 19, 2022, or thirty days after the final dispositive motion has been ruled on. D.E. 40; D.E. 47; LR 26-1(b)(5).

1 Defendant filed a motion for partial summary judgment on February 17, 2022 and a motion to strike  
2 Plaintiff's expert on April 25, 2022. D.E. 54; D.E. 63. Both motions were fully briefed as of June  
3 7, 2022. D.E. 71; D.E. 77. This Court issued an order granting Defendant's motion for partial  
4 summary judgment and motion to strike on September 15, 2022. D.E. 82; D.E. 83. Plaintiff filed  
5 motions for reconsideration of the Court's order, and this Court denied both motions for  
6 reconsideration on February 3, 2023. D.E. 90. Accordingly, MassMutual and Plaintiff must submit  
7 the Joint Pretrial Order by March 6, 2023, thirty days after this Court issued an order denying  
8 Plaintiff's Motion for Reconsideration. D.E. 40; D.E. 47; D.E. 90; LR 26-1(b)(5).

9 **(b) Reasons the Pretrial Order Deadline will not be Satisfied**

10 MassMutual respectfully submits that good cause exists for an extension until March 16,  
11 2023 to submit the Joint Pretrial Order. Since this Court issued its order on Plaintiff's Motion for  
12 Reconsideration, counsel for MassMutual has had to travel to take and defend numerous  
13 depositions, prepare for oral argument on a dispositive motion, prepare for other non-dispositive  
14 motion hearings, prepare several briefs in support of dispositive motions due in other matters, and  
15 travel out of state for speaking engagements. Consequently, MassMutual requests a short extension  
16 of ten (10) days to submit the Joint Pre-trial Order, from March 6, 2023 to March 16, 2023. Counsel  
17 for Plaintiff has consented to this request.

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**(c) Proposed Schedule for Completing Pretrial Order**

MassMutual proposes the following schedule:

1. Extend the Joint Pretrial Order Deadline from March 6, 2023 to March 16, 2023.

DATED this 28th day of February, 2023.

**WRIGHT, FINLAY & ZAK, LLP**

/s/ Robert A. Riether

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*Attorneys for Defendant, Massachusetts Mutual  
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**ORDER**

**IT IS SO ORDERED**

**DATED:** 12:55 pm, March 01, 2023



**BRENDA WEKSLER  
UNITED STATES MAGISTRATE JUDGE**

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that I am an employee of WRIGHT, FINLAY & ZAK, LLP and that service of the foregoing **JOINT MOTION FOR EXTENSION TO FILE JOINT PRETRIAL REPORT** was made on the 28th day of February, 2023, to all parties and counsel identified on the CM/ECF System via Electronic Notification.

/s/ Tonya Sessions

An Employee of WRIGHT, FINLAY & ZAK, LLP